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*Compass Bank*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA – LAS VEGAS**

BRIAN A. WALSH,  
Plaintiff,

v.

BANK OF AMERICA, N.A.,  
CAPITAL ONE, COMPASS BANK,  
MORTGAGE SERVICE CENTER,  
SPECIALIZED LOAN SERVICING,  
LLC, ROUNDPOINT MORTGAGE,  
and EXPERIAN INFORMATION  
SOLUTIONS, INC.,

Defendants.

Case No.: 2:15-cv-02350-APG-PAL

Assigned to Hon. Andrew P. Gordon

**STIPULATION FOR  
EXTENSION OF TIME TO  
RESPOND TO COMPLAINT  
(SECOND REQUEST)**

Complaint Filed: August 6, 2015  
Trial Date: TBD

Plaintiff Brian A. Walsh (“Plaintiff”) and Defendant Compass Bank (“Compass”), by their attorneys, hereby request this Honorable Court to enlarge the time for Compass to respond to Plaintiff’s Complaint, for the reasons that follow:

WHEREAS, Plaintiff filed his Complaint in state court on or about August 6, 2015. [DE 1].

WHEREAS, Compass was served with the summons and complaint on or about November 20, 2015.

1 WHEREAS, defendant Capital One Bank (USA), N.A. filed a notice of  
2 removal on or about December 9, 2015. [*Id.*].

3 WHEREAS, in his Complaint, Plaintiff alleges that Compass supposedly  
4 violated the federal Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* (“FCRA”) by reporting inaccurate information on Plaintiff’s credit report after Plaintiff’s  
5 discharge in bankruptcy. *See* Compl., ¶¶ 61-62, 70-71. [*Id.*].

7 WHEREAS, Compass filed a stipulation for extension of time to respond on  
8 December 16, 2015. [DE 15]. On December 21, 2015, Compass filed a notice of  
9 corrected document in accordance with Court’s Minute Order entered on the same  
10 day. [DE 19].

11 WHEREAS, on January 11, 2016, the Court denied without prejudice  
12 Compass’s stipulation for extension of time to respond. [DE 28]. On the same  
13 day, Compass filed an amended stipulation in accordance with the Court’s Minute  
14 Order. [DE 29].

15 WHEREAS, due to the nature of Plaintiff’s allegations, Compass requires  
16 additional time to investigate the factual allegations contained in the Complaint  
17 and prepare an appropriate response.

18 WHEREAS, the parties submit this motion not for the purpose of delay, but  
19 to allow Compass additional time to appropriately respond to the Complaint.

20 WHEREAS, no other party would be unduly prejudiced if the Court grants  
21 Compass additional time to complete its investigation.

22 WHEREAS, Plaintiff’s counsel has no objection to an extension of time up  
23 to and including February 3, 2016.

24 WHEREAS, this is Compass’s second request to an extension of time to  
25 respond.

26  
27 [continued on next page]  
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1 WHEREFORE, the parties respectfully request that this Court issue an order  
2 enlarging the time for Compass to file its response to the Complaint up to and  
3 including February 3, 2016, and that this Court provide such further relief as it  
4 deems just and necessary.

5 Dated: January 19, 2016

6 /s/ Eric Tsai

7 Eric Tsai (12882)

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14 *Attorneys for Defendant*

15 *Compass Bank*

/s/ Michael Kind

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*Attorneys for Plaintiff*

*Brian A. Walsh*

16 **IT IS SO ORDERED:**

17 

18 HONORABLE PEGGY A. LEEN

19 UNITED STATES MAGISTRATE JUDGE

20  
21 DATED: January 27, 2016

**CERTIFICATE OF SERVICE**

I, Eric Tsai, certify that on the 19th day of January 2016 and pursuant to Fed. R. Civ. P. 5, I served a true and correct copy of the foregoing document and related exhibits on all interested parties via CM/ECF.

/s/ Eric Tsai

Eric Tsai